

**REMARKS**

Claims 1-15 are all the claims pending in the application. Applicants thank the Examiner for accepting the drawings, and for acknowledging Applicants' claim for foreign priority and receipt of the certified priority document.

**Claim Rejections - 35 USC § 112**

Claims 1 and 7-9 stand rejected under 35 U.S.C. § 112, first paragraph, as based on a disclosure which is not enabling. Specifically, the Examiner states that claims 1 and 7-9 recite a limitation regarding a "subject document". Applicants have amended the claims to remove the term "subject document".

Claims 1-6 and 10-15 stand rejected under 35 U.S.C. 112, second paragraph, as being indefinite. Applicants have amended the claims in a manner thought to address each of the Examiner's concerns with these claims listed on pages 3 and 4 of the Office Action.

**Claim Rejections - 35 USC § 101**

Claims 1, 7, and 9 stand rejected under 35 U.S.C. § 101 as allegedly directed to non-statutory subject matter. The grounds of rejection state that claims 1 and 7 recite a "converting method" which is an abstract idea not tangibly embodied in a computer readable/executable medium. Claim 7 has been canceled. As for claim 1, Applicants respectfully submit that this claim is in proper method claim form according to the Rules. The Examiner is reminded that

claims directed to “software” features are more appropriately embodied in a computer readable medium.

The grounds of rejection state that Claim 8 recites “means for” identifying original locale information. The grounds of rejection further state that the means recited in this limitation are not defined in the disclosure as being tangibly embodied in a computer readable/executable medium. First, Applicants believe this rejection relates to claim 9 and not claim 8. The Examiner is kindly requested to verify if this is not the case. Further, Applicants again remind the Examiner of the Rules relating to claims requiring a computer readable medium. In this case, the means of claim 9 would be those structural elements identified in the present specification and their equivalents.

Claim Rejections - 35 USC § 103

Claims 1, 3, 7-11, and 14 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Powell (U.S. Patent 6,157,905) in view of Nakajima (U.S. Patent No. 5,550,741). As per claim 1, the grounds of rejection argue that Powell discloses a method to convert document data that includes identifying the original locale information of an original document (citing Powell, column 5, lines 10-12), identifying the original item information of the original document, in the form of character segments (citing Powell, column 13, lines 4-8), and determining a converting process based on the original location information and on subject location information of a subject document (citing Powell, Column 4, lines 53-67). The grounds of rejection acknowledge that Powell does not disclose expressly that the method includes converting data contents of the original location and item information.

To make up for this deficiency, the grounds of rejection allege that Nakajima discloses a method of converting data contents of an original document from a first language to a second

language based on the original location information and item information (citing Nakajima, column 8, lines 1326). As such, the grounds of rejection allege that at the time of the invention it would have been obvious to a person of ordinary skill in the art to include the data conversion process of Nakajima with the language identification and conversion method formulation of Powell. The motivation for doing so would have been to efficiently produce a document translated from a first language to a second language once the identification of the first language had been determined. (citing Nakajima, column 5, lines 6-9).

Applicants respectfully traverse this rejection. First, Powell does not disclose or suggest “determining a converting process based on the original locale information and on objective locale information” as asserted by the grounds of rejection. In particular, the grounds of rejection, as noted above, state that this feature is shown in col. 4, lines 53-67. Applicants note that this section of Powell only discloses how to generate or build a training database that can be used to recognize the language of a document. Powell provides no suggestion whatsoever of converting from one language to another. Rather, Powell is only concerned as to recognizing the original language of a document. Therefore, there is no suggestion of “determining a converting process” in Powell, as recited in claim 1.

Next, the grounds of rejection argue that Nakajima discloses a method of converting data contents of an original document from a first language to a second language based on the original location information and item information. Applicants submit that this assertion is also incorrect.

First, there would be no motivation to combine Powell and Nakajima. Powell, as noted, solves the problem of recognizing the language of a document. In Nakajima, the two languages

used are already known. That is, a first language document and its translation are already stored, and known (see col. 1, lines 6-15). There would be no need for recognizing the language (as in Powell) of these two documents in Nakajima since they are already known. This also precludes the suggestion of *determining* a conversion process as claimed.

Further, the grounds of rejection cite Nakajima using location information. Applicants note that this location information is not similar to locale information. That is, the Nakajima location information is a location of a word in the first language document and its corresponding location in the translation document (see col. 6, lines 8-20). Thus, Applicants respectfully submit that this concept of knowing the location of a word in a document is quite different than locale information. Accordingly, claim 1 is allowable (as well as claims 8 and 9 for similar reasons). Claim 3 is allowable at least based on its dependency on claim 1.

Claims 4 and 12 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Powell and Nakajima as applied to claim 1 above, and further in view of Kugimiya (U.S. Patent 5,587,902). The grounds of rejection acknowledge that Powell and Nakajima do not disclose expressly identifying formatting information of the original document to be used in the disclosed conversion process. Yet, the grounds of rejection state that Kugimiya discloses including format information in converting the document from a first language to a second language (citing Kugimiya, column 2, lines 10-23). Again, Applicants submit that Powell discloses no conversion process at all. In Nakajima, the subject documents have already been translated (converted), and also, position information noted. Therefore, the motivation for further using Kugimiya's formatting features provided in the grounds of rejection appears to be in hindsight.

Claim 2 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Powell and Nakajima as applied to claim 1 above, and further in view of Nagashima (U.S. Patent 5,157,606). Claims 5 and 13 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Powell and Nakajima, and further in view of Lakritz (U.S. Patent No. 6,623,529). Claims 6 and 15 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Powell, Nakajima and Nagashima as applied to claims 1 and 2 above, and further in view of Kugimiya and Latritz.

With respect to each of these rejections, Applicants again submit, as discussed above, that neither Powell nor Nakajima disclose or suggest the conversion process as recited the independent claims from which these claims depend. The grounds of rejection simply identify some feature specific to the dependent claim and allege that its combination with Powell and Nakajima would have been obvious. Applicants respectfully submit that the individual features disclosed in Nagashima, Lakritz, and Kugimiya fail to make up for the fundamental deficiency of both Powell and Nakajima neither disclosing nor suggesting the conversion features of the present invention.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

AMENDMENT UNDER 37 C.F.R. § 1.111  
U.S. Application No. 09/820,368

Attorney Docket No. Q63744

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



---

Ronald Kimble  
Registration No. 44,186

SUGHRUE MION, PLLC  
Telephone: (202) 293-7060  
Facsimile: (202) 293-7860

WASHINGTON OFFICE

**23373**

CUSTOMER NUMBER

Date: October 4, 2004